

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DERRICK PETROLEUM SERVICES,
PLAINTIFF,

V.

PLS, INC.
DEFENDANT.

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CIVIL ACTION NO. 4:14-CV-01520

DEFENDANT PLS, INC.'S DESIGNATION OF DEPOSITION EXCERPTS

Defendant, PLS, Inc. (“**PLS**”), offers the following deposition testimony to be introduced as evidence at trial. PLS reserves the right to offer additional deposition testimony as may be appropriate for both direct and rebuttal testimony of the witness.

The proposed deposition excerpts from the deposition of *Mangesh Hirve* are as follows:

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|-------------------------|-------------------------|
| 1. Page 4:11 TO 4:15 | 23. Page 40:17 TO 41:07 |
| 2. Page 5:09 TO 5:10 | 24. Page 41:09 TO 41:19 |
| 3. Page 9:16 TO 9:19 | 25. Page 43:11 TO 43:12 |
| 4. Page 13:03 TO 14:09 | 26. Page 43:13 TO 43:18 |
| 5. Page 14:21 TO 15:01 | 27. Page 46:18 TO 47:06 |
| 6. Page 15:02 TO 15:11 | 28. Page 50:07 TO 50:08 |
| 7. Page 16:13 TO 16:18 | 29. Page 50:10 TO 50:13 |
| 8. Page 19:12 TO 19:20 | 30. Page 52:20 TO 52:25 |
| 9. Page 21:17 TO 22:05 | 31. Page 53:02 TO 53:20 |
| 10. Page 22:15 TO 23:02 | 32. Page 53:22 TO 53:23 |
| 11. Page 23:14 TO 23:19 | 33. Page 54:05 TO 54:14 |
| 12. Page 25:03 TO 25:23 | 34. Page 56:21 TO 57:03 |
| 13. Page 26:25 TO 27:17 | 35. Page 65:16 TO 65:25 |
| 14. Page 27:20 TO 28:11 | 36. Page 66:02 TO 66:16 |
| 15. Page 29:23 TO 30:11 | 37. Page 67:03 TO 67:14 |
| 16. Page 31:20 TO 31:23 | 38. Page 67:16 TO 67:17 |
| 17. Page 33:03 TO 33:12 | 39. Page 81:06 TO 81:09 |
| 18. Page 35:14 TO 35:15 | 40. Page 88:03 TO 89:01 |
| 19. Page 35:17 TO 35:25 | 41. Page 94:23 TO 95:05 |
| 20. Page 37:02 TO 37:11 | 42. Page 95:12 TO 95:24 |
| 21. Page 38:01 TO 38:10 | 43. Page 96:11 TO 96:24 |
| 22. Page 39:06 TO 39:13 | |

The proposed deposition excerpts from the deposition of *Naveen Seetharama* are as follows:

1. Page 6:16 TO 6:19
2. Page 9:15 TO 10:02
3. Page 10:14 TO 10:16
4. Page 12:01 TO 12:04
5. Page 12:21 TO 12:23
6. Page 13:04 TO 13:11
7. Page 20:23 TO 21:01
8. Page 28:22 TO 28:25
9. Page 30:21 TO 31:10
10. Page 121:25 TO 122:04
11. Page 122:18 TO 122:24
12. Page 124:09 TO 124:13
13. Page 125:05 TO 125:13
14. Page 126:02 TO 126:19
15. Page 128:14 TO 129:03
16. Page 129:10 TO 129:12
17. Page 132:07 TO 132:22
18. Page 32:03 TO 32:04
19. Page 32:05 TO 32:06
20. Page 32:07 TO 32:08
21. Page 33:03 TO 33:07
22. Page 33:13 TO 33:15
23. Page 194:08 TO 194:09
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25. Page 35:07 TO 35:18
26. Page 35:19 TO 35:20
27. Page 38:01 TO 38:03
28. Page 38:04 TO 38:07
29. Page 39:04 TO 39:07
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31. Page 40:03 TO 40:09
32. Page 40:11 TO 40:11
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57. Page 102:05 TO 103:16
58. Page 104:18 TO 105:01
59. Page 105:03 TO 105:07
60. Page 137:08 TO 137:09
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63. Page 138:12 TO 138:13
64. Page 138:14 TO 138:25
65. Page 144:04 TO 144:06
66. Page 144:07 TO 145:04
67. Page 149:13 TO 149:14
68. Page 149:15 TO 150:23
69. Page 151:19 TO 152:05
70. Page 169:01 TO 169:01
71. Page 169:02 TO 169:08
72. Page 170:04 TO 170:23

Respectfully submitted, this the 31st day of October, 2014.

By: /s/ Eric Lipper

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2014, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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